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April 14, 2005

Marlene Dortch
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

Re: Ex Parte Presentation. MCI Meeting To Discuss New IP-Relay Products, Fraud Control Efforts, Demand for IP-Relay, and Other Issues, CC Docket 98-67

Dear Ms. Dortch:

Yesterday, Curtis Groves, Larry Fenster, Steve Johnson, Paul Orloff, and Tiina Keder from MCI met with Jay Keithley, Acting Chief of the Consumer and Governmental Affairs Bureau, Tom Chandler, Director of the Bureau's Disability Rights Office ("DRO") and Greg Hlibok from the DRO. We first discussed the features of MCI's new IP-Relay products: Wireless IP-Relay, My IP-Relay, My IP-Relay Number, and IP-Relay Voice. We explained that this range of new products had made relay calling, as well as text-text communication, significantly easier, and as a result had significantly improved functional equivalency for persons with speech and hearing disabilities.¹ We explained that although the total number of persons with speech and hearing disabilities had not significantly increased, these products were expanding the market by providing new forms of access and improving mobility among the user community, and were responsible for the increased number of IP-Relay calls for which MCI had sought reimbursement from the Interstate TRS Fund.

¹ MCI reassured the Commission that it had never sought reimbursement for text-text messaging.

We explained that MCI devotes significant resources to fighting fraud and harassment of relay operators in all forms, and were certain that there was a *de minimus* amount of fraud and harassment on our systems. Staff asked MCI for a copy of a White Paper explaining some of our fraud efforts. That paper is attached to this filing. Finally, we explained that MCI's wireless relay should be considered a reimbursable relay service.

If you have any questions, please contact me at the above-listed telephone number.

Sincerely,

/s/ Larry Fenster

Larry Fenster

cc: Jay Keithley
Tom Chandler
Greg Hlibok